

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

Docket No. 23-cr-00112-PB-AJ

CHARLES GLENN

**Motion to Suppress Evidence
and
Request for Evidentiary Hearing**

Defendant Charles Glenn, by undersigned counsel, respectfully moves to suppress any use of intercepted attorney-client calls from 2020 between Glenn and Atty. M.,¹ and the evidence derived from or in any way the fruit of those calls.

This motion is based upon the Fourth, Fifth, and Sixth Amendments to the United States Constitution, and 18 U.S.C. §§ 2510-2522, and is supported by the attached memorandum, exhibits, and all other matters of record in this case.

WHEREFORE, the defendant prays that the Court issue an order suppressing the aforesaid evidence for the reasons set forth herein and in any memorandum of law later submitted by counsel; and for such other and further relief as to the Court seems just.

¹ Defendant is not identifying his prior attorney by name in this public filing. The Indictment and Superseding Indictment refer to Atty. M. as “Victim #1.”

The defendant requests an evidentiary hearing on this motion. Please see attached memorandum of law.

Respectfully submitted,
CHARLES GLENN

/s/ MARK W. SHEA
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Dated: August 30, 2024

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 30, 2024.

/s/ Mark W. Shea
MARK W. SHEA